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*Special Conflicts Counsel to the Official Committee of
Unsecured Creditors of Sears Holdings Corporation, et al.*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
SEARS HOLDINGS CORPORATION, et al.,	:	Case No. 18-23538 (RDD)
Debtors. ¹	:	(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appears as Special Conflicts Counsel to the
Official Committee of Unsecured Creditors of Sears Holdings Corporation, *et al.*, a creditor and party

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

in interest, and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, request that all notices given or required to be served in this case be given or served, as the case may be, to or upon the undersigned at the Post Office address, email address and telephone and facsimile numbers set forth below.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the rules specified above but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail delivery, telephone, telegraph, facsimile transmission, telex, email or otherwise, which affects the Debtor or property of its estate.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Service of Papers, nor any later appearance, pleading, claim or suit, shall constitute an election of remedies or waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding relating to this case; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or equity, under any agreements, all of which

rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: New York, New York
May 29, 2020

MORITT HOCK & HAMROFF LLP

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